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April 1, 2024

Application **GRANTED**. The parties shall brief Defendants' contemplated motion to dismiss the Amended Complaint in accordance with their proposed schedule. In light of Defendants' representation that they intend to file a new motion to dismiss the Amended Complaint, Defendants' motion to dismiss the Complaint (and for a stay of proceedings pending resolution of that motion) is **DENIED**, as moot. So Ordered.

VIA ECF

Hon. Dale E. Ho, U.S.D.J.
 United States District Court
 Southern District of New York
 40 Foley Square, Courtroom 905
 New York, New York 10007

The Clerk of Court is respectfully directed to close the motions at ECF Nos. 10 and 15.

Dale E. Ho

U.S. District Judge

Dated: April 1, 2024

New York, New York

Re: Turman v. The Abyssinian Baptist Church and Valerie S. Grant
 Case No.: 23-cv-11304-DEH

Dear Judge Ho:

We represent defendants, The Abyssinian Baptist Church (“Abyssinian”) and Valerie S. Grant (“Grant”) (collectively, the “Defendants”) in the above matter. We write with the consent of Plaintiff’s counsel to seek an extension of the deadlines set forth in Your Honor’s March 5, 2024 Order (Dkt. #13) related to Defendants’ contemplated Motion to Dismiss the Amended Complaint (Dkt. #14) (“Motion”). The parties have not previously requested an extension of the deadlines to respond to the Amended Complaint.

As per Your Honor’s Order dated March 5, 2024 (Dkt. #13), given Plaintiff’s filing of an Amended Complaint, Defendants’ current deadline to file the Motion is April 5, 2024. Plaintiff’s current deadline to oppose the Motion is April 19, 2024, and Defendants’ current Reply deadline is April 26, 2024. Defendants respectfully request a 14-day extension of time to file the Motion as the Amended Complaint raises additional factual allegations and contains a new cause of action. Plaintiff consents to this request and the parties have jointly conferred on a briefing schedule, which is set forth below.

The parties propose the following amended deadlines:

- April 19, 2024 – Deadline for Defendants to file amended Motion
- May 10, 2024 – Deadline for Plaintiff to oppose Defendants’ amended Motion
- May 24, 2024 – Deadline for Defendants to Reply to Plaintiff’s opposition

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We thank Your Honor for the attention given to this matter.

Respectfully,

/s/Brian Pete
Counsel for Defendants

/s/ Jacob Tebele
Counsel for Defendants